

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

NANCY HENDERSON, et al.,)	
)	
Plaintiffs,)	
)	CASE NO. 3:07-cv-916-MEF
v.)	
)	
GREYHOUND LINES, INC., et al.,)	
)	
Defendants.)	
)	

PLAINTIFF'S PRE-DISCOVERY DISCLOSURE
PURSUANT TO FED. R. CIVIL P. 26(a)(1)

COME NOW, the Plaintiffs, Nancy and Thomas Henderson, by and through their attorneys, and submit the following Pre-Discovery Information pursuant to the Federal Rules of Civil Procedure 26(a)(1):

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information-along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Nancy Henderson, 2200 Canter Drive, Phenix City, AL

Thomas D. Henderson, 2200 Canter Drive, Phenix City, AL

Dr. B. Dixit, 700 Center Street, Suite 202, Columbus, GA 31901 (706) 327-5066

**Dr. Gary N. Dawson, 1900 10th Ave., Suite 300, Columbus, GA 31901-4420
(706) 243-7010**

The Medical Center, 710 Center Street, Columbus, GA 31902 (706) 571-1000

**St. Francis Hospital, 2122 Manchester Expressway, Columbus, GA 31904
(706) 596-4000**

**Dr. John M. Henderson, 2300 Manchester Expressway, Bldg. G-2, Columbus, GA
31904 (706) 323-5717**

Dr. Nitin Desai, 700 Center Street, Suite 306, Columbus, GA 31901 (706) 576-4600

Dr. Michael Gorum, 1538 13th Ave, Columbus, GA 31901 (706) 321-9300

Doctors Hospital, 616 19th Street, Columbus, GA 31902 (706) 494-4262

**Dr. J. Singh, The Medical Center, 710 Center Street, Columbus, GA 31902
(706) 571-1000**

Lisa Duty, Witness, 85 Carden Road, Seale, AL 36875

Jonathan Stephens, Witness, 5800 Windsor Drive, Columbus, GA 31909

Dale Cunningham, current address unknown

The Plaintiffs reserve the right to supplement this response as discovery is ongoing.

(ii) a copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

1. The Plaintiffs intend to use the medical records of the various medical providers identified hereinabove for Nancy Henderson regarding care and treatment she received as a result of injuries received in this accident. Copies of these documents are being delivered by U.S. mail to counsel for the Defendants.

2. The Plaintiffs intend to use the billing statements for services rendered by the medical providers of Nancy Henderson for injuries received as a result of this accident. Copies of these documents are being delivered by U.S. mail to counsel for the Defendants.

3. The Plaintiffs intend to use documentation to establish the loss of income and loss of benefits for Nancy Henderson through various documents including but not limited to tax returns, payroll information, and benefits information. These documents will be delivered when they are obtained.

4. Alabama Uniform Traffic Accident Report. A copy of this document is being delivered by U.S. mail to counsel for the Defendant.

5. Photographs of site of accident. These documents will be delivered when they are obtained.

6. Photographs of the automobile of Plaintiff, Nancy Henderson. A copy of these documents are being delivered by U.S. mail to counsel for the Defendant.

(iii) a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

The Plaintiffs are providing the medical bills in their possession for Nancy Henderson regarding care and treatment for injuries suffered as a result of this accident.

The Plaintiffs' attorneys will be calculating the claim for loss of income for Nancy Henderson and this information will be provided when calculated.

The Plaintiffs' attorneys have not yet finished the evaluation for claims of pain and suffering, loss of consortium, and psychological injury but will provide this information as soon as the evaluation is completed.

(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable.

DONE this the 29th day of February, 2008.

/s/ Melissa B. Thomas

Melissa B. Thomas (THO107)
Attorney for Plaintiffs, Nancy Henderson
and Thomas Henderson

OF COUNSEL:
MELISSA B. THOMAS,LLC
P.O. Box 1028
Phenix City, AL 36868
(334) 297-8300

/s/ James R. McKoon, Jr.

James R. McKoon, Jr. (MCK020)
Attorney for Plaintiffs, Nancy Henderson
and Thomas Henderson

OF COUNSEL:
McKOON & ASSOCIATES
P.O. Box 3220
Phenix City, AL 36868
(334) 297-2300

CERTIFICATE OF SERVICE

I hereby certify that on this the 29th day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Hon. D. Kirby Howard, Jr.
Hon. R. Brent Cueria
Hon. Michael P. Windom

/s/ Melissa B. Thomas
OF COUNSEL